IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAI'I

COLRY IOHNSON and IASON

MANCONON	CIVIL NO
MANGONON,	
Petitioners,	DECLARATION OF ABIGAIL M. HOLDEN; EXHIBITS 1 - 5
VS.	
UNITED AIRLINES, INC.,	
Respondent.	

DECLARATION OF ABIGAIL M. HOLDEN

- I, Abigail M. Holden, declare and say that:
- 1. I am one of the attorneys for United Airlines, Inc. ("United").
 All of the information stated herein is information based on my personal
 knowledge that I learned in said capacity for United. If called as a witness I could
 and would testify to the truth of the matters stated herein.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of the Verified Petition to Provide Deposition Before Action in Accordance with H.R.C.P. Rule 27 filed in the Circuit Court of the First Circuit, State of Hawai'i on February 14, 2018 ("Petition").

- 3. United was served with a copy of the Petition on February 15,2018.
- 4. United is a corporation duly organized under the laws of the State of Delaware, headquartered in Chicago, Illinois. United is not a citizen of the State of Hawai'i.
- 5. Attached hereto as Exhibit 2 is a true and correct copy of an e-mail dated January 3, 2018, Ms. Johnson wrote to United Airlines indicating that she intended to file a "Complaint against United [Airlines] in the United States District Court alleging a number of claims.
- 6. Attached hereto as Exhibit 3 is a true and correct copy of an e-mail dated January 20, 2018 from Colby Johnson to United Airlines, offering to settle Petitioners' claims against United Airlines for \$4,000,000.00 per person (apparently a total of \$8,000,000.00).
- 15. Attached hereto as Exhibit 4 is a true and correct copy of an e-mail dated February 8, 2018 from Colby Johnson to United Airlines, offering to settle Petitioner's claims against United Airlines for \$250,000 per person (apparently a total of \$500,000.00).

16. Attached hereto as Exhibit 5 is a true and correct copy of the State Court docket.

I declare under penalty of perjury under the laws of the State of Hawai'i and the United States that the foregoing is true and correct.

Executed this 27th day of February 2018, at Honolulu, Hawai'i.

/s/ Abigail M. Holden
ABIGAIL M. HOLDEN